



National Basketball Association

OFFICE OF THE GENERAL COUNSEL

Direct Dial: (212) 407-8743

Direct Fax: (212) 888-7931

APR 5 2006

U.S. DISTRICT COURT
DOCUMENT
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DOC #:
DATE FILED: 4/6/06

April 4, 2006

BY FACSIMILE AND REGULAR MAIL

Honorable Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

*The conference is adjourned to
May 12, 2006, at 9:30 a.m.
This is the last adjournment.
4-6-06
[Signature]*

Re: NBA Entertainment v. TopSports Ventures S.A. (05 Civ. 7119)

Dear Judge Hellerstein:

I am writing to request the adjournment and rescheduling of the pretrial conference in the above-referenced matter. The conference is currently scheduled for 9:30 a.m. on April 7, 2006.

I am requesting this adjournment for two reasons. First, the parties have agreed to settlement of the action in principle and are currently negotiating the terms of a settlement agreement. Second, the Summons and Complaint have still not been served upon the Defendant in Brazil pursuant to NBA Entertainment's Request for Service Abroad of Judicial or Extrajudicial Documents Pursuant to the Additional Protocol to the Inter-American Convention on Letters Rogatory. We have been advised by Brazilian counsel that any judgment from a United States court will not be accepted by the courts in Brazil unless the Defendant has been served through the Letters Rogatory procedure.

This is the Plaintiff's second request for an adjournment of the conference date. The first request, which was made on February 21, 2006, was granted by the Court. A copy of this request will be sent to the Defendant.

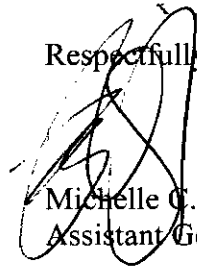
ENDORSED
I HEREBY ENDORSE that counsel to whom this Memo
is sent is responsible for faxing a
copy of this Memo to all counsel and re-
sponding to the Court's request for
information.

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The Plaintiff requests an adjournment of at least thirty (30) days. I am available on any Friday in May to attend a conference.

Thank you for your attention to this matter.

Respectfully submitted,



Michelle C. Pujals
Assistant General Counsel

cc: TopSports Ventures S.A.